

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 76

**From:** [Crowley, Shawn \(USANYS\)](#)  
**To:** [Kim, Jane \(USANYS\) 4](#)  
**Cc:** [Krouse, Michael \(USANYS\)](#); [Bove, Emil \(USANYS\)](#)  
**Subject:** Re: Draft  
**Date:** Sunday, March 8, 2020 11:23:17 PM

---

Thank you. We'll leave you guys alone tonight unless you need us. Hang in there—we'll get through this just fine. We're excited for your summations

On Mar 8, 2020, at 11:15 PM, Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)> wrote:

[Minus Stephanie \(don't want to stress her out/make her feel more sick\).](#)

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**From:** Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)>  
**Sent:** Sunday, March 8, 2020 11:03 PM  
**To:** Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>  
**Cc:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)>; Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>  
**Subject:** Re: Draft

Thanks guys. Can you forward along any reply? Thank you

On Mar 8, 2020, at 9:55 PM, Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)> wrote:

[And really sorry for the quick turnaround – the order said we had to file by 10.](#)

---

**From:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>  
**Sent:** Sunday, March 8, 2020 9:50 PM  
**To:** Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)>; Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)>  
**Cc:** Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>; Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>  
**Subject:** Draft

[Not sure Stephanie sent this to you.](#)

---

**From:** Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>  
**Sent:** Sunday, March 8, 2020 9:31 PM  
**To:** Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>  
**Subject:** RE: Proofing and then I'll file these objections

Here's a shitty draft.

---

**From:** Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>  
**Sent:** Sunday, March 08, 2020 9:15 PM  
**To:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>; Lynch, Garrett (USANYS) [Contractor] <[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>  
**Subject:** Proofing and then I'll file these objections

In 10 minutes unless anyone has objections.

Jane Kim  
Assistant United States Attorney  
Southern District of New York  
One St. Andrew's Plaza  
New York, New York 10007  
Phone: (212) 637-2038  
Email: [jane.kim@usdoj.gov](mailto:jane.kim@usdoj.gov)

<[279] Def resp re brady.pdf>  
<[279-1] Def resp re brady.pdf>

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 77

**From:** [Kim, Jane \(USANYS\) 4](#)  
**To:** [Bove, Emil \(USANYS\)](#); [Crowley, Shawn \(USANYS\)](#)  
**Cc:** [Krouse, Michael \(USANYS\)](#)  
**Subject:** RE: Draft  
**Date:** Sunday, March 8, 2020 11:30:25 PM  
**Attachments:** [\[280\] Def resp re brady.pdf](#)  
[\[280-1\] Def resp re brady.pdf](#)

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Their second response. Well, I'm glad Stephanie asked me to send the emails so this doesn't stress her more.

---

**From:** Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)>  
**Sent:** Sunday, March 8, 2020 11:28 PM  
**To:** Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)>  
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**Subject:** Re: Draft

We're going to smash these guys.

On Mar 8, 2020, at 11:23 PM, Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)> wrote:

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**Cc:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)>; Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>  
**Subject:** Re: Draft

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<[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)> wrote:

And really sorry for the quick turnaround – the order said we had to file by 10.

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**From:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>  
**Sent:** Sunday, March 8, 2020 9:50 PM  
**To:** Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)>;  
Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)>  
**Cc:** Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>; Kim,  
Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>  
**Subject:** Draft

Not sure Stephanie sent this to you.

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Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; Lynch, Garrett  
<[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS)  
[Contractor] <[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>  
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Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lake, Stephanie  
(USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>; Lynch, Garrett (USANYS)  
[Contractor] <[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>  
**Subject:** Proofing and then I'll file these objections

In 10 minutes unless anyone has objections.

Jane Kim  
Assistant United States Attorney  
Southern District of New York  
One St. Andrew's Plaza  
New York, New York 10007  
Phone: (212) 637-2038  
Email: [jane.kim@usdoj.gov](mailto:jane.kim@usdoj.gov)

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<[279-1] Def resp re brady.pdf>

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 78



**From:** [Crowley, Shawn \(USANYS\)](#)  
**To:** [Kim, Jane \(USANYS\) 4](#)  
**Cc:** [Bove, Emil \(USANYS\)](#); [Krouse, Michael \(USANYS\)](#)  
**Subject:** Re: Draft  
**Date:** Sunday, March 8, 2020 11:34:55 PM

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Did we (it doesn't matter who) respond to their last email at 1:30? Can you guys please forward us all correspondence relating to this document?

On Mar 8, 2020, at 11:30 PM, Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)> wrote:

Their second response. Well, I'm glad Stephanie asked me to send the emails so this doesn't stress her more.

---

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(USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>  
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<[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>  
**Subject:** Draft

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Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch,  
Garrett (USANYS) [Contractor]  
<[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>  
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<JKim4@usa.doj.gov>

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**To:** Krouse, Michael (USANYS)

<MKrouse@usa.doj.gov>; Lynch, Garrett

<LynchG@dany.nyc.gov>; Lake, Stephanie

(USANYS) <SLake@usa.doj.gov>; Lynch, Garrett

(USANYS) [Contractor] <GLynch@usa.doj.gov>

**Subject:** Proofing and then I'll file these objections

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Jane Kim

Assistant United States Attorney

Southern District of New York

One St. Andrew's Plaza

New York, New York 10007

Phone: (212) 637-2038

Email: [jane.kim@usdoj.gov](mailto:jane.kim@usdoj.gov)

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<[280-1] Def resp re brady.pdf>

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 79

**From:** [Kim, Jane \(USANYS\) 4](#)  
**To:** [Bove, Emil \(USANYS\)](#)  
**Cc:** [Crowley, Shawn \(USANYS\)](#); [Krouse, Michael \(USANYS\)](#)  
**Subject:** Re: Draft  
**Date:** Sunday, March 8, 2020 11:35:55 PM

---

We spoke to them by phone at 2:30 and walked through each category of their questions. I think this is it but will double check.

On Mar 8, 2020, at 11:27 PM, Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)> wrote:

We're going to smash these guys.

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<[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)>  
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<[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>; Kim, Jane (USANYS) 4  
<[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>  
**Subject:** Draft

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<[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>  
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<[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>  
**Subject:** RE: Proofing and then I'll file these objections

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**To:** Krouse, Michael (USANYS)  
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Jane Kim

Assistant United States Attorney  
Southern District of New York  
One St. Andrew's Plaza  
New York, New York 10007  
Phone: (212) 637-2038  
Email: [jane.kim@usdoj.gov](mailto:jane.kim@usdoj.gov)

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<[279-1] Def resp re brady.pdf>

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 80



**From:** [Krouse, Michael \(USANY\)](#)  
**To:** [Crowley, Shawn \(USANY\)](#); [Bove, Emil \(USANY\)](#); [Lake, Stephanie \(USANY\)](#); [Kim, Jane \(USANY\)](#) 4; [Lynch, Garrett](#); [Lynch, Garrett \(USANY\) \[Contractor\]](#)  
**Subject:** Latest version of closing  
**Date:** Monday, March 9, 2020 2:04:00 AM  
**Attachments:** [Sadr closing \(9\).docx](#)

---

The slides are also 90% done if you want to review.

Michael Krouse  
Assistant United States Attorney  
Southern District of New York  
One St. Andrew's Plaza  
New York, NY 10007  
(212) 637-2279

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 81

**From:** [Kim, Jane \(USANYS\) 4](#)  
**To:** [Bove, Emil \(USANYS\)](#); [Crowley, Shawn \(USANYS\)](#)  
**Cc:** [Krouse, Michael \(USANYS\)](#)  
**Subject:** Fwd: Order in 18cr224  
**Date:** Monday, March 9, 2020 5:48:17 AM  
**Attachments:** [18cr224 Order 3.9.20.pdf](#)  
[ATT00001.htm](#)

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Begin forwarded message:

**From:** Nathan NYSD Chambers <[NathanNYSDChambers@nysd.uscourts.gov](mailto:NathanNYSDChambers@nysd.uscourts.gov)>  
**Date:** March 9, 2020 at 1:08:53 AM EDT  
**To:** "Kim, Jane (USANYS) 4" <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>, "Lake, Stephanie (USANYS)" <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>, "[Bbishop\\_steptoe.com](mailto:Bbishop_steptoe.com)" <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>, "Fragale, David" <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>, "Levin, Michelle" <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>, "Silverman, Nicholas" <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>, "Weingarten, Reid" <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>, "Lynch, Garrett" <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>, "Lynch, Garrett (USANYS) [Contractor]" <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>, "Heberlig, Brian" <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>, "Krouse, Michael (USANYS)" <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
**Subject:** RE: Order in 18cr224

Counsel,

Attached please find an Order from Judge Nathan that will appear on the docket today. Please confirm receipt.

Sincerely,  
Alyssa O'Gallagher  
Law Clerk to the Hon. Alison J. Nathan

---

**From:** Nathan NYSD Chambers  
**Sent:** Sunday, March 8, 2020 9:42 PM  
**To:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; [Bbishop\\_steptoe.com](mailto:Bbishop_steptoe.com) <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; Fragale, David <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>; Levin, Michelle <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; Silverman, Nicholas <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; Weingarten, Reid <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; Heberlig, Brian <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
**Subject:** RE: Order in 18cr224

Counsel,

Attached please find another Order from Judge Nathan that will appear on the docket on Monday. Please confirm receipt.

Sincerely,  
Alyssa O'Gallagher  
Law Clerk to the Hon. Alison J. Nathan

---

**From:** Nathan NYSD Chambers  
**Sent:** Sunday, March 8, 2020 9:06 PM  
**To:** 'Kim, Jane (USANYS) 4' <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; 'Lake, Stephanie (USANYS)' <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; [Bbishop\\_steptoe.com](mailto:Bbishop_steptoe.com) <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; 'Fragale, David' <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>; 'Levin, Michelle' <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; 'Silverman, Nicholas' <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; 'Weingarten, Reid' <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; 'Lynch, Garrett' <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; 'Lynch, Garrett (USANYS) [Contractor]' <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; 'Heberlig, Brian' <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; 'Krouse, Michael (USANYS)' <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
**Subject:** RE: Order in 18cr224

Counsel,

Attached please find another Order from Judge Nathan that will appear on the docket on Monday. Please confirm receipt.

Sincerely,  
Alyssa O'Gallagher  
Law Clerk to the Hon. Alison J. Nathan

---

**From:** Nathan NYSD Chambers  
**Sent:** Sunday, March 8, 2020 5:01 PM  
**To:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; [Bbishop\\_steptoe.com](mailto:Bbishop_steptoe.com) <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; Fragale, David <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>; Levin, Michelle <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; Silverman, Nicholas <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; Weingarten, Reid <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; Heberlig, Brian <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
**Subject:** RE: Order in 18cr224

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**Sent:** Sunday, March 8, 2020 4:04 PM  
**To:** 'Kim, Jane (USANYS) 4' <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; 'Lake, Stephanie (USANYS)' <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; [Bbishop@steptoe.com](mailto:Bbishop@steptoe.com) <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; 'Fragale, David' <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>; 'Levin, Michelle' <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; 'Silverman, Nicholas' <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; 'Weingarten, Reid' <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; 'Lynch, Garrett' <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; 'Lynch, Garrett (USANYS) [Contractor]' <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; 'Heberlig, Brian' <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; 'Krouse, Michael (USANYS)' <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
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**From:** Nathan NYSD Chambers  
**Sent:** Sunday, March 8, 2020 12:48 PM  
**To:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; [Bbishop@steptoe.com](mailto:Bbishop@steptoe.com) <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; Fragale, David <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>; Levin, Michelle <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; Silverman, Nicholas <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; Weingarten, Reid <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; Heberlig, Brian <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
**Subject:** RE: Order in 18cr224

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**Subject:** Order in 18cr224

Counsel,

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Sincerely,  
Alyssa O’Gallagher  
Law Clerk to the Hon. Alison J. Nathan

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 82

**From:** [Crowley, Shawn \(USANYS\)](#)  
**To:** [Kim, Jane \(USANYS\) 4](#)  
**Cc:** [Bove, Emil \(USANYS\)](#); [Krouse, Michael \(USANYS\)](#)  
**Subject:** Re: Order in 18cr224  
**Date:** Monday, March 9, 2020 7:24:07 AM

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Thanks guys. I know you've got this, but I think we need to fall on our sword big time here. We didn't make that clear in the transmittal email and shouldn't have represented that we did. We'll see you soon. It's going to be ok.

On Mar 9, 2020, at 5:48 AM, Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)> wrote:

Begin forwarded message:

**From:** Nathan NYSD Chambers  
<[NathanNYSDChambers@nysd.uscourts.gov](mailto:NathanNYSDChambers@nysd.uscourts.gov)>  
**Date:** March 9, 2020 at 1:08:53 AM EDT  
**To:** "Kim, Jane (USANYS) 4" <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>, "Lake, Stephanie (USANYS)" <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>, "[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)" <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>, "Fragale, David" <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>, "Levin, Michelle" <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>, "Silverman, Nicholas" <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>, "Weingarten, Reid" <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>, "Lynch, Garrett" <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>, "Lynch, Garrett (USANYS) [Contractor]" <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>, "Heberlig, Brian" <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>, "Krouse, Michael (USANYS)" <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
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Counsel,

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Sincerely,  
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Law Clerk to the Hon. Alison J. Nathan

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**From:** Nathan NYSD Chambers  
**Sent:** Sunday, March 8, 2020 9:42 PM



**To:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; [Bbishop\\_steptoe.com](mailto:Bbishop_steptoe.com) <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; Fragale, David <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>; Levin, Michelle <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; Silverman, Nicholas <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; Weingarten, Reid <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; Heberlig, Brian <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
**Subject:** RE: Order in 18cr224

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**Sent:** Sunday, March 8, 2020 9:06 PM  
**To:** 'Kim, Jane (USANYS) 4' <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; 'Lake, Stephanie (USANYS)' <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; [Bbishop\\_steptoe.com](mailto:Bbishop_steptoe.com) <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; 'Fragale, David' <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>; 'Levin, Michelle' <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; 'Silverman, Nicholas' <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; 'Weingarten, Reid' <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; 'Lynch, Garrett' <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; 'Lynch, Garrett (USANYS) [Contractor]' <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; 'Heberlig, Brian' <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; 'Krouse, Michael (USANYS)' <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
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**To:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; [Bbishop\\_steptoe.com](mailto:Bbishop_steptoe.com) <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; Fragale, David <[Dfragale@steptoe.com](mailto:Dfragale@steptoe.com)>; Levin, Michelle <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; Silverman, Nicholas <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; Weingarten, Reid <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; Heberlig, Brian <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>

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**To:** 'Kim, Jane (USANYS) 4' <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; 'Lake, Stephanie (USANYS)' <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; [Bbishop\\_steptoe.com](mailto:Bbishop_steptoe.com) <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; 'Fragale, David' <[Dfragale@steptoe.com](mailto:Dfragale@steptoe.com)>; 'Levin, Michelle' <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; 'Silverman, Nicholas' <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; 'Weingarten, Reid' <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; 'Lynch, Garrett' <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; 'Lynch, Garrett (USANYS) [Contractor]' <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; 'Heberlig, Brian' <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; 'Krouse, Michael (USANYS)' <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>

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**Subject:** Order in 18cr224

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Sincerely,  
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Law Clerk to the Hon. Alison J. Nathan

<18cr224 Order 3.9.20.pdf>

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 83

**From:** [Krouse, Michael \(USANYS\)](#)  
**To:** [Crowley, Shawn \(USANYS\)](#)  
**Cc:** [Kim, Jane \(USANYS\) 4](#); [Bove, Emil \(USANYS\)](#)  
**Subject:** Re: Order in 18cr224  
**Date:** Monday, March 9, 2020 7:34:54 AM

---

I'm ready to fall. I'm here if you'd like to discuss.

Sent from my iPhone

On Mar 9, 2020, at 7:24 AM, Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)> wrote:

Thanks guys. I know you've got this, but I think we need to fall on our sword big time here. We didn't make that clear in the transmittal email and shouldn't have represented that we did. We'll see you soon. It's going to be ok.

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<[NathanNYSDChambers@nysd.uscourts.gov](mailto:NathanNYSDChambers@nysd.uscourts.gov)>  
**Date:** March 9, 2020 at 1:08:53 AM EDT  
**To:** "Kim, Jane (USANYS) 4" <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>, "Lake, Stephanie (USANYS)" <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>, "[Bbishop\\_steptoe.com](mailto:Bbishop_steptoe.com)" <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>, "Fragale, David" <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>, "Levin, Michelle" <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>, "Silverman, Nicholas" <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>, "Weingarten, Reid" <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>, "Lynch, Garrett" <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>, "Lynch, Garrett (USANYS) [Contractor]" <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>, "Heberlig, Brian" <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>, "Krouse, Michael (USANYS)" <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
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**Sent:** Sunday, March 8, 2020 9:42 PM  
**To:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; [Bbishop@steptoe.com](mailto:Bbishop@steptoe.com) <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; Fragale, David <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>; Levin, Michelle <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; Silverman, Nicholas <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; Weingarten, Reid <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; Heberlig, Brian <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
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**To:** 'Kim, Jane (USANYS) 4' <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; 'Lake, Stephanie (USANYS)' <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; [Bbishop@steptoe.com](mailto:Bbishop@steptoe.com) <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; 'Fragale, David' <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>; 'Levin, Michelle' <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; 'Silverman, Nicholas' <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; 'Weingarten, Reid' <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; 'Lynch, Garrett' <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; 'Lynch, Garrett (USANYS) [Contractor]' <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; 'Heberlig, Brian' <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; 'Krouse, Michael (USANYS)' <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
**Subject:** RE: Order in 18cr224

Counsel,

Attached please find another Order from Judge Nathan that will appear on the docket on Monday. Please confirm receipt.

Sincerely,  
Alyssa O’Gallagher  
Law Clerk to the Hon. Alison J. Nathan

---

**From:** Nathan NYSD Chambers  
**Sent:** Sunday, March 8, 2020 5:01 PM  
**To:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; [Bbishop\\_steptoe.com](mailto:Bbishop@steptoe.com) <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; Fragale, David <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>; Levin, Michelle <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; Silverman, Nicholas <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; Weingarten, Reid <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; Heberlig, Brian <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
**Subject:** RE: Order in 18cr224

Counsel,

Attached please find a third Order from Judge Nathan that will appear on the docket on Monday. Please confirm receipt.

Sincerely,  
Alyssa O’Gallagher  
Law Clerk to the Hon. Alison J. Nathan

---

**From:** Nathan NYSD Chambers  
**Sent:** Sunday, March 8, 2020 4:04 PM  
**To:** 'Kim, Jane (USANYS) 4' <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; 'Lake, Stephanie (USANYS)' <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; [Bbishop\\_steptoe.com](mailto:Bbishop@steptoe.com) <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; 'Fragale, David' <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>; 'Levin, Michelle' <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; 'Silverman, Nicholas'

<[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; 'Weingarten, Reid'  
<[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; 'Lynch, Garrett'  
<[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; 'Lynch, Garrett (USANYS)  
[Contractor]' <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; 'Heberlig, Brian'  
<[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; 'Krouse, Michael (USANYS)'  
<[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>

**Subject:** RE: Order in 18cr224

Counsel,

Attached please find another Order from Judge Nathan that will appear on the docket on Monday. Please confirm receipt.

Sincerely,  
Alyssa O'Gallagher  
Law Clerk to the Hon. Alison J. Nathan

---

**From:** Nathan NYSD Chambers  
**Sent:** Sunday, March 8, 2020 12:48 PM  
**To:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; [Bbishop\\_steptoe.com](mailto:Bbishop_steptoe.com) <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; Fragale, David <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>; Levin, Michelle <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; Silverman, Nicholas <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; Weingarten, Reid <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; Heberlig, Brian <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
**Subject:** RE: Order in 18cr224

Counsel,

Please confirm receipt of this Order.

Sincerely,  
Alyssa O'Gallagher  
Law Clerk to the Hon. Alison J. Nathan

---

**From:** Nathan NYSD Chambers  
**Sent:** Sunday, March 8, 2020 12:41 PM  
**To:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Lake,



Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>;  
[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com) <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; Fragale,  
David <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>; Levin, Michelle  
<[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; Silverman, Nicholas  
<[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; Weingarten, Reid  
<[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; Lynch, Garrett  
<[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS)  
[Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; Heberlig, Brian  
<[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; Krouse, Michael (USANYS)  
<[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>

**Subject:** Order in 18cr224

Counsel,

Attached please find an Order from Judge Nathan that will  
appear on the docket on Monday.

Sincerely,  
Alyssa O’Gallagher  
Law Clerk to the Hon. Alison J. Nathan

<18cr224 Order 3.9.20.pdf>

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 84

**From:** [Krouse, Michael \(USANYS\)](#)  
**To:** [Lynch, Garrett \(USANYS\) \[Contractor\]](#); [Lake, Stephanie \(USANYS\)](#); [Kim, Jane \(USANYS\) 4](#)  
**Subject:** RE: Order  
**Date:** Monday, March 9, 2020 7:58:00 AM

---

I will handle the argument about GX 411. Can one of you handle: (1) making sure we have admitted everything we want to admit as exhibits; (2) arguing defense exhibits?

---

**From:** Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>  
**Sent:** Monday, March 9, 2020 7:56 AM  
**To:** Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>  
**Subject:** Order

What is the order for today? Is this it?

1. Peri cross/redirect.
2. Payments.
3. Payment problems.
4. Travel.
5. Follow the money.
6. Conte.
7. Evasion.

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 85

**From:** [Kim, Jane \(USANYS\) 4](#)  
**To:** [Krouse, Michael \(USANYS\)](#); [Lynch, Garrett \(USANYS\) \[Contractor\]](#); [Lake, Stephanie \(USANYS\)](#)  
**Subject:** RE: Order  
**Date:** Monday, March 9, 2020 7:59:50 AM

---

Yes. I can also put in Stephanie's stuff and put Conte on.

---

**From:** Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>  
**Sent:** Monday, March 9, 2020 7:59 AM  
**To:** Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>  
**Subject:** RE: Order

I will handle the argument about GX 411. Can one of you handle: (1) making sure we have admitted everything we want to admit as exhibits; (2) arguing defense exhibits?

---

**From:** Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>  
**Sent:** Monday, March 9, 2020 7:56 AM  
**To:** Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>  
**Subject:** Order

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2. Payments.
3. Payment problems.
4. Travel.
5. Follow the money.
6. Conte.
7. Evasion.

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 86

**From:** [Krouse, Michael \(USANYS\)](#)  
**To:** [Kim, Jane \(USANYS\) 4](#); [Lynch, Garrett \(USANYS\) \[Contractor\]](#); [Lake, Stephanie \(USANYS\)](#)  
**Subject:** RE: Order  
**Date:** Monday, March 9, 2020 8:00:00 AM

---

Great, thanks!

---

**From:** Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>  
**Sent:** Monday, March 9, 2020 8:00 AM  
**To:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; Lynch, Garrett (USANYS) [Contractor] <[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>; Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>  
**Subject:** RE: Order

Yes. I can also put in Stephanie's stuff and put Conte on.

---

**From:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>  
**Sent:** Monday, March 9, 2020 7:59 AM  
**To:** Lynch, Garrett (USANYS) [Contractor] <[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>; Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>; Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>  
**Subject:** RE: Order

I will handle the argument about GX 411. Can one of you handle: (1) making sure we have admitted everything we want to admit as exhibits; (2) arguing defense exhibits?

---

**From:** Lynch, Garrett (USANYS) [Contractor] <[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>  
**Sent:** Monday, March 9, 2020 7:56 AM  
**To:** Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>; Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>  
**Subject:** Order

What is the order for today? Is this it?

1. Peri cross/redirect.
2. Payments.
3. Payment problems.
4. Travel.
5. Follow the money.
6. Conte.
7. Evasion.

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 87



**From:** [Krouse, Michael \(USANYS\)](#)  
**To:** [Lynch, Garrett \(USANYS\) \[Contractor\]](#)  
**Subject:** Head to court  
**Date:** Monday, March 9, 2020 8:37:07 AM

---

Hey man, I think we should all be here in case the judge has questions. We'll have time for Talya at the break.

Sent from my iPhone

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 88

**From:** [Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)  
**To:** [Bove, Emil \(USANYS\)](#); [Kim, Jane \(USANYS\) 4](#)  
**Cc:** [MariaHelene.VanWagenberg@treasury.gov](mailto:MariaHelene.VanWagenberg@treasury.gov); [Jacqueline.Brewer@treasury.gov](mailto:Jacqueline.Brewer@treasury.gov); [Lake, Stephanie \(USANYS\)](#); [Krouse, Michael \(USANYS\)](#); [LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov); [Lynch, Garrett \(USANYS\) \[Contractor\]](#); [Crowley, Shawn \(USANYS\)](#)  
**Subject:** RE: Time Sensitive Question  
**Date:** Monday, March 9, 2020 10:50:15 AM

---

Cell: 202-746-4485

---

**From:** Bove, Emil (USANYS) <Emil.Bove@usdoj.gov>  
**Sent:** Monday, March 9, 2020 10:25 AM  
**To:** Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>  
**Cc:** Miremadi, Kaveh <Kaveh.Miremadi@treasury.gov>; Van Wagenberg, Maria-Helene <MariaHelene.VanWagenberg@treasury.gov>; Brewer, Jacqueline <Jacqueline.Brewer@treasury.gov>; Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>; LynchG@dany.nyc.gov; Lynch, Garrett (USANYS) [Contractor] <Garrett.Lynch@usdoj.gov>; Crowley, Shawn (USANYS) <Shawn.Crowley@usdoj.gov>  
**Subject:** Re: Time Sensitive Question

**\*\* Caution:** External email. Pay attention to suspicious links and attachments. Send suspicious email to [suspect@treasury.gov](mailto:suspect@treasury.gov) \*\*

Hi Kaveh, what number can we reach you at?

On Mar 9, 2020, at 10:04 AM, Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)> wrote:

I don't. I'm adding my Chiefs to this chain.

On Mar 9, 2020, at 9:23 AM, "[Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)" <[Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)> wrote:

Hi Jane,

Do you know who or what division in OFAC this letter was sent to? I'm searching our records now. We may not be able to get you a comprehensive answer this morning.

Kaveh

---

**From:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>

**Sent:** Sunday, March 8, 2020 5:58 PM

**To:** Miremadi, Kaveh <[Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)>; Van Wagenberg, Maria-Helene <[MariaHelene.VanWagenberg@treasury.gov](mailto:MariaHelene.VanWagenberg@treasury.gov)>; Brewer, Jacqueline <[Jacqueline.Brewer@treasury.gov](mailto:Jacqueline.Brewer@treasury.gov)>

**Cc:** Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>

**Subject:** Time Sensitive Question

**\*\* Caution:** External email. Pay attention to suspicious links and attachments. Send suspicious email to [suspect@treasury.gov](mailto:suspect@treasury.gov) \*\*

Kaveh, Maria, and Jacqui:

I'm attaching a letter dated June 16, 2011, from Commerzbank to OFAC concerning a specific payment. Could you please let us know what actions OFAC took in response to this letter? We need to update the Court on this issue tomorrow morning, so any information would be hugely appreciated.

Thank you in advance,  
Jane

Jane Kim  
Assistant United States Attorney  
Southern District of New York  
One St. Andrew's Plaza  
New York, New York 10007  
Phone: (212) 637-2038  
Email: [jane.kim@usdoj.gov](mailto:jane.kim@usdoj.gov)

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 89

**From:** [Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)  
**To:** [Kim, Jane \(USANYS\) 4](#)  
**Cc:** [Bove, Emil \(USANYS\)](#); [MariaHelene.VanWagenberg@treasury.gov](mailto:MariaHelene.VanWagenberg@treasury.gov); [Jacqueline.Brewer@treasury.gov](mailto:Jacqueline.Brewer@treasury.gov); [Lake, Stephanie \(USANYS\)](#); [Krouse, Michael \(USANYS\)](#); [LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov); [Lynch, Garrett \(USANYS\) \[Contractor\]](#); [Crowley, Shawn \(USANYS\)](#)  
**Subject:** Re: Time Sensitive Question  
**Date:** Monday, March 9, 2020 4:36:21 PM

---

I'm available now for a call. Thanks.

---

**From:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>  
**Date:** March 9, 2020 at 4:07:18 PM EDT  
**To:** Miremadi, Kaveh <[Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)>  
**Cc:** Bove, Emil (USANYS) <[Emil.Bove@usdoj.gov](mailto:Emil.Bove@usdoj.gov)>, Van Wagenberg, Maria-Helene <[MariaHelene.VanWagenberg@treasury.gov](mailto:MariaHelene.VanWagenberg@treasury.gov)>, Brewer, Jacqueline <[Jacqueline.Brewer@treasury.gov](mailto:Jacqueline.Brewer@treasury.gov)>, Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>, Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>, LynchG@dany.nyc.gov <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>, Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>, Crowley, Shawn (USANYS) <[Shawn.Crowley@usdoj.gov](mailto:Shawn.Crowley@usdoj.gov)>  
**Subject:** Re: Time Sensitive Question

**\*\* Caution:** External email. Pay attention to suspicious links and attachments. Send suspicious email to [suspect@treasury.gov](mailto:suspect@treasury.gov) \*\*

Kaveh, just tried your cell. Please let me know when you're free to talk. Thanks.

On Mar 9, 2020, at 10:50 AM, "[Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)" <[Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)> wrote:

Cell: 202-746-4485

---

**From:** Bove, Emil (USANYS) <[Emil.Bove@usdoj.gov](mailto:Emil.Bove@usdoj.gov)>  
**Sent:** Monday, March 9, 2020 10:25 AM  
**To:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>  
**Cc:** Miremadi, Kaveh <[Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)>; Van Wagenberg, Maria-Helene <[MariaHelene.VanWagenberg@treasury.gov](mailto:MariaHelene.VanWagenberg@treasury.gov)>; Brewer, Jacqueline <[Jacqueline.Brewer@treasury.gov](mailto:Jacqueline.Brewer@treasury.gov)>; Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>; [LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov); Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; Crowley, Shawn (USANYS) <[Shawn.Crowley@usdoj.gov](mailto:Shawn.Crowley@usdoj.gov)>

**Subject:** Re: Time Sensitive Question

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Send suspicious email to [suspect@treasury.gov](mailto:suspect@treasury.gov) \*\*

Hi Kaveh, what number can we reach you at?

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I don't. I'm adding my Chiefs to this chain.

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<[Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)> wrote:

Hi Jane,

Do you know who or what division in OFAC this letter was sent to? I'm searching our records now. We may not be able to get you a comprehensive answer this morning.

Kaveh

---

**From:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>

**Sent:** Sunday, March 8, 2020 5:58 PM

**To:** Miremadi, Kaveh <[Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)>; Van Wagenberg, Maria-Helene

<[MariaHelene.VanWagenberg@treasury.gov](mailto:MariaHelene.VanWagenberg@treasury.gov)>; Brewer, Jacqueline <[Jacqueline.Brewer@treasury.gov](mailto:Jacqueline.Brewer@treasury.gov)>

**Cc:** Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>

**Subject:** Time Sensitive Question

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Kaveh, Maria, and Jacqui:

I'm attaching a letter dated June 16, 2011, from Commerzbank to OFAC concerning a specific payment. Could you please let us know what actions OFAC took in response to this letter? We need to update the Court on this issue tomorrow morning, so any information would be hugely appreciated.

Thank you in advance,  
Jane

Jane Kim  
Assistant United States Attorney  
Southern District of New York  
One St. Andrew's Plaza  
New York, New York 10007  
Phone: (212) 637-2038  
Email: [jane.kim@usdoj.gov](mailto:jane.kim@usdoj.gov)



Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 90

**From:** [Michael Krouse](#)  
**To:** [Krouse, Michael \(USANY\)](#)  
**Date:** Monday, March 9, 2020 4:48:42 PM

---

No confirmation received it

Office global targeting—heard from one but not two others

Enforcement division—they can't find it

Compliance division—they can't find it.

Look like something that would go to them.

Oasis system - haven't been able to locate

Did not utilize electronic tracker until 2012. Not as consistent for things older

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 91

**From:** [Kim, Jane \(USANYS\) 4](#)  
**To:** [Krouse, Michael \(USANYS\)](#)  
**Subject:** No recollection of seeing exhibit  
**Date:** Monday, March 9, 2020 6:17:32 PM

---

No recollection of seeing exhibit

No interactions with OFAc about sadr or XX

These dates, DANY investigation. I was assigned. Other AUSAs assigned. Today I spoke to xyz. On x, voluntarily produced. On x, DOJ, DANY, x entered into a DP with commerce banks. Based on information from a confidential source, DANY started investigating Sadr x. On x, they issued a subpoena to Commerzbank requesting xyz. Garrett got files. Continued investigation. Presented to us on xyz. Transmitted that presentation to OFAC. We produced Commerzvank stuff on this date.

Something describing his diligence today. He thinks first time he sent GX 411 on this day. Attach transmittal email unless highly sensitive. Why did he suddenly think about it? We acknowledge that at the time this was transferred, he was a member of the prosecution team, failure. Should have but did not assess whether produced. Assumed it had been produced. Friday night, Stephanie finds it. Then rehash the chron. In response to the Court's order, scrubbed files. Then Sunday night, we called and emailed OFAC. Describe OFAC's diligence. Will stipulate toxyz.

Steptoe publicized the settlement FN

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 92

**From:** [Krouse, Michael \(USANYS\)](#)  
**To:** [Emil J. Bove \(Emil.Bove@usdoj.gov\)](#); [Crowley, Shawn \(USANYS\)](#)  
**Subject:** FW: Sadr - wire transfers  
**Date:** Monday, March 9, 2020 6:24:00 PM  
**Attachments:** [Commerz OFAC disclosure.pdf](#)

---

Here is the January 10 email Garrett sent us. No one responded.

---

**From:** Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>  
**Sent:** Friday, January 10, 2020 4:52 PM  
**To:** Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>  
**Cc:** Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>  
**Subject:** RE: Sadr - wire transfers

In the spirit of closing the loop on the \$29M payment through Commerz, attached is the voluntary disclosure Commerze made to OFAC re: the payment.

---

**From:** Lake, Stephanie (USANYS) [<mailto:Stephanie.Lake@usdoj.gov>]  
**Sent:** Friday, January 10, 2020 3:16 PM  
**To:** Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>  
**Cc:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
**Subject:** RE: Sadr - wire transfers

Closing the loop on this– I found a document in the material Fuenmayor gave us that discusses the \$29 million transfer through Fondo Chino, and he also mentioned it in the last meeting. I think this should be helpful in tying the wire information we have showing the Fondo Chino transfer to PDVSA. The doc is attached, if anyone cares, but it's also en Espanol (I've requested translation). Pages 14-15.

---

**From:** Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>  
**Sent:** Wednesday, January 08, 2020 12:46 PM  
**To:** Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>  
**Cc:** Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>  
**Subject:** RE: Sadr - wire transfers

The Venezuelans used various state-owned “funds” and banks to fund various government projects, among them BANDES, the economic and social development bank (which, I believe made some early payments (not ours) related to the project), and Fondo Chino (the Chinese-Venezuelan Fund). Fondo Chino (at least ostensibly) was funded by oil sales to and loans from China (I think PDVSA and the government liberally moved money around). I forget exactly why Fondo Chino was used to make the first payment (or if we ever knew for sure) – my guess is that PDVSA, which controlled all oil-related funds (i.e., the Venezuelan purse), had adequate funds in the Fondo Chino account to make the payment from that account. I believe the money came from a Banco del Tesoro account in Venezuela, which had a correspondent relationship with Commerz in Germany. Thereafter, they

used PDVSA accounts at Banco Espirito Santo in Portugal.

---

**From:** Lake, Stephanie (USANYS) [<mailto:Stephanie.Lake@usdoj.gov>]  
**Sent:** Wednesday, January 8, 2020 11:02 AM  
**To:** Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>  
**Cc:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
**Subject:** RE: Sadr - wire transfers

Found the first one. Thanks. Do you know why it came from "Fondo Chino" / what that is?

That's fine on two. Just wanted to make sure I wasn't missing some other records that would show that information.

Definitely agree on the third point.

Thank you!

---

**From:** Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>  
**Sent:** Wednesday, January 08, 2020 10:04 AM  
**To:** Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>  
**Cc:** Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>  
**Subject:** RE: Sadr - wire transfers

1. Re: the first payment, there should be a copy of the SWIFT message in the Commerzbank production. In my version of the subpoena compliance production it's a PDF titled "Copy".
2. Re: the identity of the intermediary bank, the bank whose business record the wire transfer is is the intermediary bank, so the witness will be able to state that.
3. Also, for several of the payments, we have additional search warrant documents -- e.g., while we may just have the wire transfer record from the clearing bank, we may also have a SWIFT message attached to an email, or a Hyposwiss record, or some other document which identifies the payment route. When the dust settles on the SW docs, we can reconstruct my old payments binders where I had all of the documents bundled together for each payment (the payment instruction letter, the bank record(s), emails, attachments, etc.). This is what we did for the GJ.

---

**From:** Lake, Stephanie (USANYS) [<mailto:Stephanie.Lake@usdoj.gov>]  
**Sent:** Tuesday, January 7, 2020 6:19 PM  
**To:** Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>  
**Subject:** FW: Sadr - wire transfers

My original email had three attachments, which had to be sent to you securely. So you should be getting a secure message with instructions on how to access it.

---

**From:** Lake, Stephanie (USANYS)

**Sent:** Tuesday, January 07, 2020 5:37 PM

**To:** Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>

**Subject:** Sadr - wire transfers

See attached a spreadsheet (Payments) showing each transfer and where I found documentation. A few things:

- 1) I didn't find a wire confirmation for the 4/4/2011 \$29 million transfer. I did find reference to it in the CHIPS subpoena returns. It seems to show that it went from "Fondo Chino-Venezolano" to Stratus International Contracting (see attached two spreadsheets that show this). Garrett – do you know if we have a wire confirmation for that transfer?
- 2) I noticed that the wire confirmations don't generally show the U.S. intermediary bank on them. Is there other documentation I'm missing that has this information?

\*All documents are saved here: [\\Usa.doj.gov\\cloud\\NYS\\StAndrews\\Shared\\Iran\\_VEHousing-2017R01160\\###Trial\\Documents\\Payment](\\Usa.doj.gov\\cloud\\NYS\\StAndrews\\Shared\\Iran_VEHousing-2017R01160\\###Trial\\Documents\\Payment) Records and here: [\\Usa.doj.gov\\cloud\\NYS\\StAndrews\\Shared\\Iran\\_VEHousing-2017R01160\\Evidence](\\Usa.doj.gov\\cloud\\NYS\\StAndrews\\Shared\\Iran_VEHousing-2017R01160\\Evidence) [INT]\\Discovery\\#5 - Subpoena Returns\\To Produce.

Also – Garrett, I was thinking that if you don't already have the ability to remotely login to our network, we should have that set up! That way the file paths above wouldn't be useless to you.

Thanks!

Stephanie Lake  
Assistant United States Attorney  
Southern District of New York  
One Saint Andrew's Plaza  
New York, NY 10007  
Tel: (212) 637-1066

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return email.

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 93

**From:** [Lynch, Garrett](#)  
**To:** [Krouse, Michael \(USANYS\)](#)  
**Date:** Monday, March 9, 2020 6:26:18 PM  
**Attachments:** [00206BBA05AF200309182049.pdf](#)  
[Draft declaration \(Lynch\).docx](#)

---

Draft declaration and related docs attached.

Garrett A. Lynch  
Deputy Bureau Chief  
Major Economic Crimes Bureau  
New York County District Attorney's Office  
(212) 335-4335  
[lynchg@dany.nyc.gov](mailto:lynchg@dany.nyc.gov)

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Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 94

**From:** [Krouse, Michael \(USANYS\)](#)  
**To:** [Emil J. .Bove \(Emil.Bove@usdoj.gov\)](#); [Shawn G. .Crowley \(Shawn.Crowley@usdoj.gov\)](#); [Kim, Jane \(USANYS\) 4](#)  
**Subject:** FW:  
**Date:** Monday, March 9, 2020 6:32:00 PM  
**Attachments:** [00206BBA05AF200309182049.pdf](#)  
[Draft declaration \(Lynch\).docx](#)

---

---

**From:** Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>  
**Sent:** Monday, March 9, 2020 6:23 PM  
**To:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>  
**Subject:**

Draft declaration and related docs attached.

Garrett A. Lynch  
Deputy Bureau Chief  
Major Economic Crimes Bureau  
New York County District Attorney's Office  
(212) 335-4335  
[lynchg@dany.nyc.gov](mailto:lynchg@dany.nyc.gov)

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Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 95

**From:** [Krouse, Michael \(USANYS\)](#)  
**To:** [Crowley, Shawn \(USANYS\)](#); [Emil J. Bove \(Emil.Bove@usdoj.gov\)](#); [Kim, Jane \(USANYS\) 4](#)  
**Subject:** FW:  
**Date:** Monday, March 9, 2020 6:43:00 PM  
**Attachments:** [00206BBA05AF200309182049.pdf](#)  
[Draft declaration \(Lynch\).docx](#)

---

Email on page 15 references the powerpoint. We don't have the powerpoint included. Asking Garrett now.

---

**From:** Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>  
**Sent:** Monday, March 9, 2020 6:23 PM  
**To:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>  
**Subject:**

Draft declaration and related docs attached.

Garrett A. Lynch  
Deputy Bureau Chief  
Major Economic Crimes Bureau  
New York County District Attorney's Office  
(212) 335-4335  
[lynchg@dany.nyc.gov](mailto:lynchg@dany.nyc.gov)

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Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 96



**From:** [Krouse, Michael \(USANYS\)](#)  
**To:** [Crowley, Shawn \(USANYS\)](#); [Emil J. .Bove \(Emil.Bove@usdoj.gov\)](#); [Kim, Jane \(USANYS\) 4](#)  
**Subject:** RE:  
**Date:** Monday, March 9, 2020 6:44:00 PM

---

Garrett says he can't find the sent email. So doesn't know exactly which powerpoint was sent. Laroche is on the email, though, so maybe he has it.

---

**From:** Krouse, Michael (USANYS)  
**Sent:** Monday, March 9, 2020 6:43 PM  
**To:** Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)>; Emil J. .Bove (Emil.Bove@usdoj.gov) <[Emil.Bove@usdoj.gov](mailto:Emil.Bove@usdoj.gov)>; Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>  
**Subject:** FW:

Email on page 15 references the powerpoint. We don't have the powerpoint included. Asking Garrett now.

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**From:** Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>  
**Sent:** Monday, March 9, 2020 6:23 PM  
**To:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>  
**Subject:**

Draft declaration and related docs attached.

Garrett A. Lynch  
Deputy Bureau Chief  
Major Economic Crimes Bureau  
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[lynchg@dany.nyc.gov](mailto:lynchg@dany.nyc.gov)

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Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 97

**From:** [Kim, Jane \(USANYS\) 4](#)  
**To:** [Laroche, Matthew \(USANYS\)](#)  
**Cc:** [Krouse, Michael \(USANYS\)](#)  
**Subject:** Slightly urgent  
**Date:** Monday, March 9, 2020 6:46:06 PM

---

Matt, so sorry to bother you.

Do you have a copy of a September 22, 2017 email from Garrett to Michael Dondarski, copying you, subject "Case" that attaches a powerpoint? We need the powerpoint (and the email). Thanks.

Jane Kim  
Assistant United States Attorney  
Southern District of New York  
One St. Andrew's Plaza  
New York, New York 10007  
Phone: (212) 637-2038  
Email: [jane.kim@usdoj.gov](mailto:jane.kim@usdoj.gov)

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 98

**From:** [Kim, Jane \(USANYS\) 4](#)  
**To:** [Bove, Emil \(USANYS\)](#); [Krouse, Michael \(USANYS\)](#); [Crowley, Shawn \(USANYS\)](#)  
**Subject:** RE:  
**Date:** Monday, March 9, 2020 6:48:00 PM

---

We just emailed and called. Will keep you posted.

---

**From:** Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)>  
**Sent:** Monday, March 9, 2020 6:47 PM  
**To:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)>; Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>  
**Subject:** RE:

Makes sense to give Matt a call. Thanks guys.

---

**From:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>  
**Sent:** Monday, March 9, 2020 6:45 PM  
**To:** Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)>; Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)>; Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>  
**Subject:** RE:

Garrett says he can't find the sent email. So doesn't know exactly which powerpoint was sent. Laroche is on the email, though, so maybe he has it.

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**From:** Krouse, Michael (USANYS)  
**Sent:** Monday, March 9, 2020 6:43 PM  
**To:** Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)>; Emil J. Bove ([Emil.Bove@usdoj.gov](mailto:Emil.Bove@usdoj.gov)) <[Emil.Bove@usdoj.gov](mailto:Emil.Bove@usdoj.gov)>; Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>  
**Subject:** FW:

Email on page 15 references the powerpoint. We don't have the powerpoint included. Asking Garrett now.

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**From:** Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>  
**Sent:** Monday, March 9, 2020 6:23 PM  
**To:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>  
**Subject:**

Draft declaration and related docs attached.

Garrett A. Lynch  
Deputy Bureau Chief  
Major Economic Crimes Bureau  
New York County District Attorney's Office  
(212) 335-4335

[lynchg@dany.nyc.gov](mailto:lynchg@dany.nyc.gov)

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